

KEKER & VAN NEST LLP
ROBERT A. VAN NEST - #84065
rvannest@kvn.com
CHRISTA M. ANDERSON - #184325
canderson@kvn.com
DANIEL PURCELL - #191424
dpurcell@kvn.com
710 Sansome Street
San Francisco, CA 94111-1704
Telephone: (415) 391-5400
Facsimile: (415) 397-7188

KING & SPALDING LLP
DONALD F. ZIMMER, JR. - #112279
fzimmer@kslaw.com
CHERYL A. SABNIS - #224323
csabnis@kslaw.com
101 Second Street, Suite 2300
San Francisco, CA 94105
Telephone: (415) 318-1200
Facsimile: (415) 318-1300

Attorneys for Defendant
GOOGLE INC.

KING & SPALDING LLP
SCOTT T. WEINGAERTNER (*Pro Hac Vice*)
sweingaertner@kslaw.com
ROBERT F. PERRY
rperry@kslaw.com
BRUCE W. BABER (*Pro Hac Vice*)
bbaber@kslaw.com
1185 Avenue of the Americas
New York, NY 10036-4003
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

GREENBERG TRAURIG, LLP
IAN C. BALLON - #141819
ballon@gtlaw.com
HEATHER MEEKER - #172148
meekerh@gtlaw.com
1900 University Avenue, Fifth Floor
East Palo Alto, CA 94303
Telephone: (650) 328-8500
Facsimile: (650) 328-8508

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 3:10-cv-03561 WHA

**GOOGLE INC.'S ADMINISTRATIVE
MOTION TO SEAL PORTION OF TRIAL
BRIEF**

Judge: The Honorable William Alsup

Trial Date: October 31, 2011

Pursuant to the Northern District of California's Civil Local Rules 7-11 and 79-5, Defendant Google Inc. ("Google") hereby brings this Administrative Motion to Seal the following portions of its Trial Brief:

1. Page 4, lines 8-22;
2. Page 5, lines 8-9;
3. Page 6, lines 10-16;
4. Page 6, lines 20-21;
5. Page 6, line 25 through page 7, line 5;
6. Page 19, lines 12-14; and
7. Page 22, lines 10-12.

These portions of Google's Trial Brief contain information that has been designated by either Google or Oracle America, Inc. ("Oracle") as Confidential or Highly Confidential – Attorneys' Eyes Only pursuant to the Order Approving Stipulated Protective Order Subject to Stated Conditions entered in this case. [Dkt. No. 68.]

Google submits the Declaration of Daniel Purcell ("Purcell Decl.") in support of its motion to seal the Google confidential material contained in its Trial Brief. Purcell Decl. ¶ 2. Google takes no position as to whether disclosure of materials designated by Oracle as Confidential or Highly Confidential – Attorneys' Eyes Only material would cause harm to Oracle, and would not oppose an order requiring Oracle to make that information public. *Id.* ¶ 3.

Dated: October 14, 2011

KEKER & VAN NEST LLP

By: /s/ Daniel Purcell

DANIEL PURCELL
Attorneys for Defendant
GOOGLE INC.